

**GOVERNMENT/INDUSTRY CHARTING FORUM**  
**Instrument Procedures Group**  
**November 28-29, 2000**  
**HISTORY RECORD**

**FAA Control # 00-02-229**

**SUBJECT: Turbine-powered Holding**

**BACKGROUND/DISCUSSION:** AFS-420 issued a policy letter to AVN-100 in June, 1998, which prohibits 175-knot holding patterns on SIAPs that have any or all of the following approach categories authorized: C, D, and E. Recently, non-compliant SIAPs at Helena, MT became an issue because those SIAPs have 175-knot airspace constraints, yet the prohibited approach categories are authorized. ALPA proposed that a temporary solution would be to restrict turbojet aircraft from the holding patterns. AFS-420 decided instead that "turbine-powered aircraft" be prohibited from the holding pattern. This was because of the concern for high-performance turboprop aircraft having holding characteristics similar to turbojet aircraft, especially during icing conditions.

Some users of Helena Airport are unhappy with this restriction extending to a smaller class of turboprop aircraft, such as the Beechcraft King Air. On the other hand, should all Category B aircraft be permitted to use 175-knot holding patterns, or should no Category B aircraft that are turbine-powered be permitted to use these restricted holding patterns?

**RECOMMENDATION:** The instrument procedures group needs to consider this issue with the goal of permitting 175-knot holds for helicopters of all types, low-performance turboprop aircraft, but to exclude all high-performance turbine-powered *airplanes*, even those that fit into Approach Category B.

**COMMENTS:** This affects FAA holding pattern policies and directives.

Submitted by Captain Simon Lawrence, Chairman  
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**INITIAL DISCUSSION (Meeting 00-02):** Wally Roberts presented this issue on behalf of ALPA recommending the position that 175 KIAS holding be allowed for helicopters of all types, low-performance turboprop aircraft, but to exclude all high-performance turbine-powered airplanes, even those that fit into Approach Category B. A discussion ensued as to how to differentiate between "low performance" and "high performance" aircraft. Randy Kenagy, AOPA, noted that there are many CAT B aircraft that would be unnecessarily penalized by not allowing them to use 175 KIAS holding. There was no consensus on the issue and Dave Eckles, AFS-420, agreed to take it for study. Pat Fair, ATA-130, agreed to

check the NFDC database to determine how many and where 175 KIAS holding patterns are published. Wally further noted that there is no AIM material for climb-in-hold airspeeds. Dave agreed to forward this item to Steve Jackson, AFS-420, for action. **ACTION: AFS-420 and ATA-130.**

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**MEETING 01-01:** Pat Fair, ATA-130, briefed that there are no more 175K holding patterns currently published on SIAP's. Wally Roberts, ALPA, stated that this satisfied ALPA's concern relative to SIAP's and requested that 175K holding also be eliminated from en route charts. Pat agreed to research the NFDC database to determine where these patterns were charted. The search results will be forwarded to Marty Walker, ATP-120, for action. Marty will then coordinate with the affected facilities to determine where the patterns may be eliminated, revised to accommodate a higher airspeed, and where they must be retained. Changes, where possible, must be forwarded to AVN-100 for Form 8260-2 action. Dave Eckles, AFS-420, added that AIM material for climb-in-hold is under development. **ACTION: AFS-420, ATA-130, and ATP-120.**

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**MEETING 01-02:** Norm LeFevre, AFS-420, briefed that Flight Standards has studied the issue and believes that it is not an aircraft Category issue, but rather a performance issue. Pilots must be aware that if they are unable to accept an ATC assignment; e.g., 175 KIAS holding, they are responsible to make the controller aware of it. Terry Mahaffey, ATP-104 (NATCA), emphasized that the controller is, in turn, responsible to respond to a pilot's advisory. Marty Walker, ATP-120, advised that Pat Fair, ATA-130, provided him a list of 175K holding patterns currently published on en route charts. Marty briefed that there are 14 patterns published and all are necessary for various reasons (congested airspace, obstructions, etc). The AFS-420 IOU to publish AIM information regarding climb-in-hold pattern airspeeds has been accomplished [see AIM, paragraph 5-3-7j2(b)(5)]. It was noted that AIM paragraph 5-3-7j2(b)(2) requires correction to eliminate the CAT A and B annotation. Norm stated that AFS-420 would make this change. **ACTION: AFS-420.**

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**MEETING 02-01:** Norm LeFevre, AFS-420, briefed that Flight Standards has studied the issue and believes that it is not an aircraft Category issue, but rather a performance issue. He also briefed that AFS-420 did not process the requested correction to eliminate the Category A and B annotation from AIM paragraph 5-3-7j2(b)(2) due to staffing constraints. Wally Roberts, ALPA, noted that Order 7130.3, *Holding Pattern Criteria*, paragraph 2-8b (1) allows 175 knot restricted holding up to FL 300. This is nearly impossible for high performance air carriers. Wally recommended an altitude (jet) limitation on 175-Knot holding to FL 180. Norm agreed to take this suggestion to AFS-420 for consideration. Marty Walker, ATP-120, agreed to include a briefing article in the Controller Bulletin to sensitize ATC to the fact that 175-Knot holding may cause problems for some aircraft. **ACTION: AFS-420 and ATP-120.**

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**MEETING 02-02:** Tom Schneider, AFS-420, briefed the status of the issue. Carl Moore, who is the AFS-420 staff specialist for holding issues, has indicated general agreement that 175 KIAS holding could be reasonably restricted to a maximum of 18,000'. However, before any changes would be made to Order 7130.3 or the AIM, Air Traffic must determine if there is a need for 175 KIAS patterns at altitudes above 18,000'. Valerie Watson, ATA130, took the IOU to review the NFDC database to determine the exact number of restricted 175 KIAS

patterns and their use. Marty Walker, ATP-120 will coordinate whether air traffic has a need for 175 KIAS holding at altitudes above FL 180. Marty also briefed that, as requested at the last ACF, he has published a briefing article in the Air Traffic Bulletin to sensitize ATC to the fact that 175-Knot holding may cause problems for some aircraft. Kevin Comstock, ALPA, requested the status of problems with the Helena, MT SIAPs. Bran Rush, AVN-160, stated that amended procedure amendments were in the development process and that NOTAMs were in place to address the current 175 knot turbojet holding concerns. Tom stated that the AFS-420 IOU to amend AIM paragraph 5-3-7j2(b)(2) to eliminate the CAT A&B reference has not been accomplished.

**ACTION:** ATA-100, ATP-120, and AFS-420.

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**MEETING 03-01:** There was no representative from ATP-120 to address the issue. Valerie Watson, ATA-130 stated that she provided a list of 175K holding patterns to ATP-120. AFS-420 can take no action to revise Order 7130.3 pending response from ATP-120. Tom Schneider, AFS-420, briefed that the change to AIM paragraph 5-3-7j2(b)(2) to eliminate the CAT A&B reference was published on February 20. ATP-120 must assess the air traffic need for 175 holding above FL 180 and advise AFS-420. **ACTION:** ATP-120.

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**MEETING 03-02:** Marty Walker, ATP-120, briefed that coordination through various air traffic offices indicate that no one is aware where 175 KIAS holding is required above FL 180. At the chair's suggestion, Marty agreed to formally advise AFS-420 that this requirement is no longer needed. When received, AFS-420 will revise Order 7130.3 accordingly.

**ACTION:** ATP-120 and AFS-420.

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**MEETING 04-01:** Bill Hammett, AFS-420 (ISI), briefed that this issue remains open pending receipt of a formal memorandum from ATP-120 to AFS-420 stating that 175 KIAS holding is no longer required by ATC above FL 180. The previous ATP-120 representative had stated this position in open forum; however, AFS-420 would like the position in writing prior to revising Order 7130.3, *Holding Pattern Criteria*. Unfortunately, the ATP-120 representative was not in attendance due to a family emergency. The chair took an IOU to follow this up with ATP-120. **ACTION:** ACF-IPG Chair and ATP-120.

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**MEETING 04-02:** Bill Hammett, AFS-420 (ISI), briefed that there has still been no correspondence from Air Traffic to validate that 175 KIAS holding is no longer required above FL 180. Although the previous ATP-120 representative has stated this position in open forum, AFS-420 would like the position in writing prior to revising Order 7130.3, *Holding Pattern Criteria*. Tom Schneider briefed that he, as chair of the IPG, took an IOU at the last meeting to follow this up with ATP-120. Tom stated that despite frequent e-mails, phone calls, etc., he has been unable to resolve the issue. He plans an in-person visit to the responsible Air Traffic office following the ACF meeting.

**Editor's Note:** Tom Schneider spoke with Dave Madison, ATP-101, on the issue during a brief impromptu meeting on October 26<sup>th</sup>. Dave provided a new Air Traffic point of contact for the ACF-IPG; however, Tom was unsuccessful in making contact with the staff worker.

**ACTION:** ACF-IPG Chair and ATP-120.

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**MEETING 05-01:** Tom Schneider, AFS-420, briefed that this issue remains open pending receipt of a formal memorandum from ATP-120 to AFS-420 stating that 175 KIAS holding is no longer required above FL 180. Tom also noted that there was no Air Traffic Terminal Procedures representative in attendance despite frequent reminders of the meeting (this makes three meetings in a row without an Air Traffic (AT) procedures representative). Bill Hammett, AFS-420 (ISI), briefed that a query of the NFDC National Airspace Resources (NASR) data base indicated there are 19 175 KIAS restricted holding patterns, only one of which allows use above FL 180. Mike Riley, NGA, recommended a formal memorandum from the Chair to the Division Chief asking for ACF participation. Tom agreed to do so. Bill recommended AFS-400 initiate interim policy to disallow 175 KIAS holding above FL 180 pending revision of Order 7130.3 and provide a copy to AT. They can comment at that point.

**Editor's Note:** Two days later, during a break at the ACF Charting Group meeting, Tom Schneider, AFS-420, approached Mark Washam, Airspace and Procedures Branch, to discuss the AT issues his office was responsible for. Mark stated that his manager, Dave Madison, Director of Terminal Safety and Operations Support under ATO-T, said that they would not provide a letter because they did not believe it was necessary.

**Item Open (AFS-420).**

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**MEETING 05-02:** Bill Hammett, AFS-420 (ISI), briefed that after the last meeting, the ATO-T representative advised the ACF-IPG Chair that the Director of Terminal Safety and Operations Support stated that they did not believe a letter confirming the ATO position on the subject was necessary. As a result, and to resolve the ACF issue, AFS-420 revised its policy memorandum on 175 KIAS holding to only allow the practice below FL 180. Additionally, all 175 KIAS holding patterns other than those published on IAPs restricted to Category A and B aircraft require a Flight Standards waiver approval. A policy memorandum was signed by AFS-400 on July 7<sup>th</sup> and forwarded to the National Flight Procedures Group with a copy to the applicable Air Traffic Offices. The revised policy will be included in the next revision to Order 7130.3A, *Holding Pattern Criteria* and may be viewed at [http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/afs400/afs420/policies\\_guidance/memorandums/](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs400/afs420/policies_guidance/memorandums/). Also at the last meeting, it was recommended that the ACF-IPG Chair send a memorandum to the Director of Terminal Safety and Operations Support regarding the lack of attendance at ACF-IPG meetings by an air traffic control terminal procedures specialist. The Chair prepared a memorandum to ATO-T that was forwarded through AFS-400 on June 24<sup>th</sup>. The result was successful as an ATO-T representative was in attendance. Copies of both memorandums were provided in the meeting handout material and were included as attachments 4 and 5 of the meeting minutes. Bill recommended the issue be closed and the Group concurred. **Issue Closed.**

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